

## REMARKS

In an Office Action mailed on August 8, 2007, objections were made to claims 5, 21 and 26; claims 26, 28-30, 32-34, 36 and 37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Evans; claims 1-6, 8-14, 16-22 and 24-25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Marcos; and claims 7, 15 and 23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Marcos in view of Gould; and claims 27, 31 and 35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Evans in view of Marcos.

Regarding the claim objections, claim 5 has been cancelled, and claims 21 and 26 have been amended, as suggested by the Examiner. Thus, Applicant respectfully requests withdrawal of the objections.

Regarding the § 103 rejection of independent claim 1, the method of claim 1 recites providing a first request to access a function that is associated with a first object model and converting the first request into a second request that is associated with a second object model, which is different from the first object model. The method includes creating an object that is associated with the second object model in response to the second request.

Applicant submits that a *prima facie* case of obviousness has not been set forth for claim 1. In this regard, the Office Action refers to paragraph nos. 7 and 105 of Marcos as allegedly disclosing, alone or in combination, all of the claim limitations except the limitation regarding that the request is converted. Office Action, 6. However, Applicant respectfully submits that the Office Action fails to explain why Marcos purportedly teaches or suggests creating an object that is associated with the second object model in response to the second request. In this regard, both the acts of converting the first request into a second request and creating an object associated with the second object model occur in response to the second request.

Contrary to the claimed invention, however, Marcos merely discloses in paragraph no. 105 translating arguments obtained in a message sent by an object of a first object model into arguments that are used by another object that is implemented using a second object model. Paragraph no. 7 of Marcos merely discloses different examples of object models. However, neither paragraph no. 7, paragraph no. 105 nor any other portion of Marcos addresses creating an object in response to a second request, where the second request is converted from a first request. In this regard, Marcos does not address the creation of objects in response to the disclosed

message translation. Therefore, for at least this reason, Applicant respectfully requests reconsideration of the § 103 rejection of claim 1.

For similar reasons, independent claims 10 and 18 overcome the § 103 rejections. In this regard, the computer system of independent claim 10 includes a second component to create an object that is associated with a second object in response to a second request, which is a result of the conversion by a first component of the computing system in response to a first request that is associated with a first object model. A *prima facie* case of obviousness has not been established for claim 10 for at least the reason that Marcos fails to teach or suggest the second component of claim 10. Likewise, the article of independent claim 18 includes a storage medium that stores instructions that when executed cause a processor-based system to convert a first request associated with a first object model into a second request associated with a second object model that is different from the first object model, and create an object that is associated with the second object model in response to the second request. A *prima facie* case of obviousness has not been established for independent claim 18 for at least the reason that Marcos fails to teach or suggest instructions to cause a processor-based system to create the object, as specified in claim 18.

Dependent claims 2-4, 6-9, 11-17 and 19-25 are patentable and thus, overcome the § 103 rejections for at least the reason that these claims depend from allowable claims.

Regarding the § 103 rejection of independent claim 26, as amended, the method of claim 26 recites using a subscriber to a publish-subscribe messaging protocol to receive a message that is published via the protocol. The method also recites communicating the message to multiple non-subscribers.

Claim 26 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Evans. In particular, the Office Action refers to Fig. 3 of Evans as purportedly disclosing the limitations of claim 26. Office Action, 3. The Office Action states that although Evans does not explicitly disclose communicating the message to multiple non-subscribers, one of ordinary skill in the art would have recognized that Evans purportedly implies communicating messages to multiple non-subscribers in order to determine if they are subscribers. However, this reasoning is not sufficient to support the case of obviousness. In other words, there has been no showing that Evans communicates messages to non-subscribers for purposes of determining if they are subscribers. In fact, Fig. 3 of Evans is not directed to a subscribe-message protocol.

More specifically, Fig. 1 of Evans discloses one type of messaging protocol, and Fig. 2 describes a publish-and-subscribe protocol. Evans states that it is possible to create complex paradigms from the arrangements disclosed in Figs. 1 and 2. Evans, paragraph no. 28. However, In Figs. 3-5 of Evans, which purportedly disclose variations of Figs. 1 and 2, Fig. 3 is not directed to a modification of Fig. 2, the publish and subscribe protocol, but rather, Fig. 3 is directed to a modification of Fig. 1 that does not mention subscribers. In other words, Fig. 3 of Evans is a modification of the arrangement depicted in Fig. 1, without any mentioning of the publish and subscribe protocol. Thus, the receivers 17 of Fig. 3 are not described as being necessarily subscribers. Without such a disclosure, it does not follow that one of skill in the art in possession of Evans would have derived the claimed invention of using a subscriber to a publish-subscribe messaging protocol to receive a message published via the protocol and communicate the message to multiple non-subscribers.

It is noted that although Evans discloses in Fig. 5 a subscribe and publish protocol and discusses a subscriber 25, there is no reasoning why one of skill in the art in possession of Evans would have modified the protocol set forth in Fig. 5 to derive the claimed invention, i.e., communicating a message received by a subscriber to a publish-subscribe messaging protocol to multiple non-subscribers. Therefore, for at least any of the foregoing reasons, Applicant respectfully submits that a *prima facie* case of obviousness has not been set forth for claim 26.

For similar reasons, a *prima facie* case of obviousness has not been set forth for either independent claim 30 or 34 in view of Evans, as sufficient reasoning has not been set forth in the Office Action regarding why the prior art purportedly teaches or suggests the second component of claim 30 or the instructions to cause a processor-based system to communicate a message to multiple non-subscribers of claim 34.

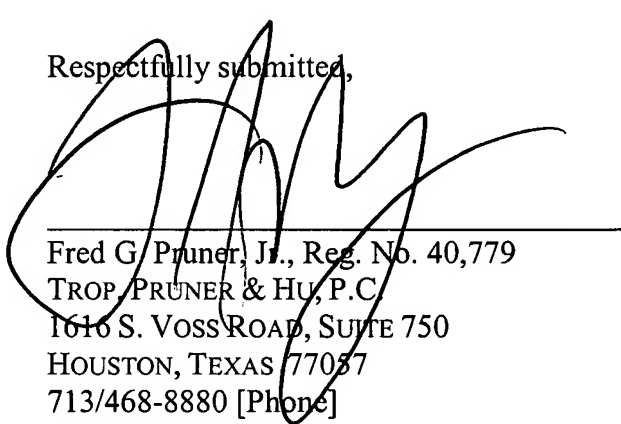
Dependent claims 27-29, 31-33 and 35-37 are patentable for at least the reason that these claims depend from allowable claims.

### CONCLUSION

In view of the foregoing, Applicant respectfully requests withdrawal of the § 103 rejections and a favorable action in the form of a Notice of Allowance. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (ITL.0902US).

Respectfully submitted,

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